

No. 03-19-00198-CV

In the Court of Appeals
Third Judicial District

FILED IN
3rd COURT OF APPEALS
AUSTIN, TEXAS
5/1/2020 11:08:25 AM
JEFFREY D. KYLE
Clerk

Madeleine Connor,
Appellant

vs.

Douglas Hooks,
Appellee

From the 201st District Court of Travis County, Texas
Cause Number D-1-GN-18-005130
The Honorable Catherine Mauzy, District Judge Presiding

MOTION FOR LEAVE TO SUBMIT SUPPLEMENTAL BRIEF

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ATTORNEY FOR APPELLANT CONNOR

TO THE HONORABLE THIRD COURT OF APPEALS:

COMES NOW David Rogers, attorney of record for Appellant Madeleine Connor, and files this Motion to Submit a Supplemental Brief.

Appellant retained the services of the undersigned on April 2, 2020. Since that time, the undersigned has determined that supplemental briefing would be a benefit to the Court. Furthermore, the undersigned believes that his duty to zealously represent his client compels additional briefing to the Court on the issues for review raised in this case.

WHEREFORE, PREMISES CONSIDERED, the undersigned prays that the Court allow a supplemental brief in order to fully inform the Court of case law developments relevant to this matter. This request made not for purposes of delay, but solely so that justice may be served.

Respectfully submitted,

/s/ David Rogers

David Rogers

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CERTIFICATE OF CONFERENCE

I conferred with Sherry Rasmus, counsel for Appellee with respect to this motion via email, on April 25-27, 2018, and emailed her a detailed message regarding the filing of this motion, and I was;

 X able to confer with such counsel, and he advises me that

 X Defendant is opposed to the relief requested; and

 /s/ David Rogers

David Rogers
Attorney for Madeleine Connor

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been served on all counsel of record on May 1, 2020, in compliance with TRCP 21 and 21a.

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 /s/ David Rogers

David Rogers

Attorney for Appellant Connor

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Associated Case Party: Madeleine Connor

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